

Comments on text resulting from the Terrestrial Animal Health Code Commission Report – December, 2003 Meeting Submitted by the United States of America on October 20, 2004

Guidelines for the Humane Killing of Animals for Disease Control Purposes

The United States supports the World Organization for Animal Health (OIE) in its initiative to enhance its leadership role in providing global animal welfare guidance and standards. We concur with the importance of science-based standards and the significance of incremental change and commitment to continuous improvement taking into account regional, religious, and cultural issues that may impact the establishment of animal welfare guidelines.

Specific comments

We are submitting the following comments to specific text contained within the document titled “Guidelines for the Humane Killing of Animals for Disease Control Purposes.”

Definitions

Current proposed text:

Death means irreversible loss of brain activity as demonstrated by loss of brain stem reflexes.

Suggested proposed text:

Death means irreversible loss of brain activity as demonstrated by loss of brain stem reflexes such as, loss of palpebral reflex.

Comment/Rationale:

It would be helpful to the reader if the definition contained a few examples of signs of irreversible loss of brain activity.

Article 1

General principles of humane killing

Current proposed text:

Item 12: When the operational procedures are concluded, there should be a written report describing the practices adopted and their effect on animal welfare, operator safety and biosecurity.

Suggested proposed text:

~~Item 12: When the operational procedures are concluded, there should be a written report describing the practices adopted and their effect on animal welfare, operator safety and biosecurity.~~

Comment/Rationale:

Using such a practice does not enhance animal welfare; therefore, item 12 should be deleted.

Article 3**Responsibilities and skills of the specialist team****Team Leader****Responsibilities****Current proposed text:**

Sub-bullet 3: Organise, brief and manage team of people to facilitate humane killing of the relevant animals on the premises in accordance with national regulations and these guidelines.

Suggested proposed text:

Sub-bullet 3: Organise, brief and manage team of people to facilitate humane killing of the relevant animals on the premises in accordance with national regulations and these guidelines or which ever takes precedence.

Comment/Rationale:

The current proposed text implies that the national regulations and these guidelines are or will be compatible. We recommend that the text should include provisions for the potential situation that the national regulations and the guidelines are not compatible.

Article 4**Operational procedures****Planning the humane killing of animals****Current proposed text:**

Last sentence: In designing a killing plan, it is essential that the method chosen is consistently reliable to ensure that all animals are humanely and quickly killed.

Suggested proposed text:

Last sentence: “In designing a killing plan, it is essential that the method chosen is consistently reliable to ensure that all animals are humanely and quickly killed. Certain methods should not be used because they are not humane. These include death by air embolism, burning alive, burying alive, decompression, dehydration, drowning, freezing, maceration for non-neonate poultry and eggs, poisoning by cyanide or strychnine (or other painful agents), starvation, and strangulation.

Comment/Rationale:

Our experts agree that the proposed document should contain a list of the pros and cons of the most commonly used methods to humanely kill animals for disease control. Similarly, they recommend that the proposed document also list methods of killing animals that should never be used because they are not humane.

Article 5**Table summarising killing methods****Current proposed text:****Method Gaseous**

Method	Procedure	Induction of unconsciousness	Animal welfare concerns	Key requirements	Applicable species
Gaseous	CO ₂ air mixture	not immediate	CO ₂ concentration	suitable equipment	poultry and neonate sheep, goats and pigs
	inert gas CO ₂ mixture	not immediate	CO ₂ concentration	suitable equipment	poultry
	inert gases	not immediate	O ₂ concentration	suitable equipment	poultry

Suggested proposed text:

Method	Procedure	Induction of unconsciousness	Animal welfare concerns	Key requirements	Applicable species
Gaseous	CO ₂ air mixture	not immediate	CO ₂ concentration	suitable equipment	poultry* ₌ and neonate sheep, goats and pigs
	inert gas CO ₂ mixture	not immediate	CO ₂ concentration	suitable equipment	poultry* ₌
	inert gases	not immediate	O ₂ concentration	suitable equipment	poultry* ₌

* Except those species that are adaptable to low oxygen concentrations.

Comment/Rationale: Some species of ducks are adaptable to low oxygen concentrations, therefore, the use of gaseous killing methods is not humane or appropriate for use in those animals.

The following comments/recommendations are concerned with specific text formatting or grammatical issues within the document titled “Guidelines for the Humane Killing of Animals for Disease Control Purposes”.

Article 1

General principles of humane killing

Current proposed text:

Item 3: The following principles apply after a decision to kill the animals has been made.

Suggested proposed text:

Item 3: The following principles apply after a decision to kill the animals has been made.
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Article 2

Organizational structure

Current proposed text:

First paragraph: The operational activities should be led by an *official veterinarian* who has the authority to ensure that animal welfare standards are adhered to and who should ensure that the personnel involved has the required competencies.

Suggested proposed text:

First paragraph: The operational activities should be led by an *official veterinarian* who has the authority to ensure that animal welfare standards are adhered to and who should ensure that the personnel involved ~~has~~ have the required competencies.

Article 10

Percussive blow

Requirements for effective use

Current proposed text:

Bullet 1: A single sharp blow should be delivered to the central skull bones, either by an implement (such as a hammer or a commercially-available poultry killer)

Suggested proposed text: A single sharp blow should be delivered to the central skull bones, either by an implement (such as a hammer) or a commercially-available poultry killer.

Article 13

Requirements for effective use

Current proposed text:

Bullet 4: The stunner control device should generate a low frequency (30 – 60 Hz) current with a minimum voltage of 250 volts true RMS under load

Suggested proposed text:

Bullet 4: The stunner control device should generate a low frequency (30 – 60 Hz) current with a minimum voltage of 250 volts true ~~RMS~~ Root Mean Square under load

Article 20

Addition of anaesthetics to feed or water

Advantages

Current proposed text:

Bullet 3: May be biosecurity advantages in the case of large numbers of diseased birds

Suggested proposed text:

Bullet 3: May ~~be~~ offer biosecurity advantages in the case of large numbers of diseased birds